

# **EXHIBIT B**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001 03-md-1570  
(GBD)(SN)

This document relates to:

*Alexander Jimenez, et al. v. Islamic Republic of Iran, No. 1:18-cv-11875 (GBD) (SN)*

**DECLARATION OF FAMILIAL RELATIONSHIP**

I, Jaimercedes Taveras, declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. My name is Jaimercedes Taveras, and I am the stepdaughter of Manuel De Jesus Molina ("Manuel") who died on September 11, 2001 ("9/11") when the World Trade Center collapsed. I submit this Declaration to demonstrate I am the functional equivalent of Manuel's daughter.

2. Manuel started dating my mother, Mercedes Hernandez Molina, in 1991. In 1995, my mother, my two older sisters, Jaimelin and Jaimenys, and I moved into a 3-bedroom apartment with Manuel at 3407 DeKalb Avenue in the Bronx, and we became a family. We lived together there until his death on September 11, 2001, when I was 8 years old. From 1997 until 2002, Manuel's cousin lived with us there as well. My mother believes that Manuel was my biological father but at the time of his death had not secured a Court order stating this. Regardless, throughout my entire life he acted as a father and provider to me and that's how I have always known him, as my Papa.

3. Manuel supported our family and took care of us. Due to my mom's disability, he not only was the sole wage earner for my family, he also had the lead role in the family's home life and in child-rearing. Manuel assisted extensively in common household chores, grocery shopping, cleaning, and childcare due to my mom's disability. He helped me and my sisters with our math homework, he attended our school events and medical appointments, he cooked small meals for us, helped me get dressed, played with us at home, and bought my sisters and me birthday and Christmas presents (his birthday was Christmas Eve so it was always an even more festive time of year). He would take us to the park, on regular weekend trips to Manhattan to visit my grandmother (his mother) and my aunt (his sister) who lived two doors down, and on vacations to his hometown in the Dominican Republic to visit his side of the family and their extensive collection of roosters. He did everything a father would be expected to do for his children, as well as most of the things a mother would do (since my mom's activities were limited due to her disability). See photos attached as Exhibit 1. His death created a large void that was never filled.

4. I remember he tried to keep a rooster and two other birds in our small Bronx apartment and took pictures of me with the birds. Unfortunately, we had to get rid of the birds because their food attracted cockroaches.

5. I remember one time he and my mom were helping me with my math homework by drawing little apples for me, but then it turned into a competition between him and my mom about who could draw the best apple. They also would play each other in Tetris and occasionally let me and my sister Jaimelin join in. They loved each other so much.

6. Every night he would hug me goodnight. I would ask for his blessing and he would say a traditional Dominican blessing to me. I remember every weekday waiting for him to come home from work. He liked to work out, but he also wanted to spend as much time as possible with his three daughters. I remember sitting on his back while he would do push-ups in our living room, while we listened to romantic Bachata music and his favorite artist Joe Veras or watched the Aristocats in Spanish, or one of his favorite boxers, Oscar de la Hoya. He had a whole stack of Bachata CDs. Even now, I still have parts of these songs memorized. On weekends he loved to play dominoes and made sure we knew how to play. Because of him, I'm one of the best dominoes players you'll ever meet.

7. He was supportive, funny, attentive, and always tried to hide the ugly parts of the world from my sisters and me. He was so peaceful and quiet, you could never argue with him. But he also wanted to make sure he raised his girls with strong values. I remember once I was talking to a friend on the phone and I used a curse word. He overheard. No computer, phone or TV for two weeks! Instead, he insisted that I spend that time with him, my mama, and my sisters and he would teach us how to play dominoes. I also remember he wouldn't let me get press-on nails because he thought I was too young, even though my older sisters were allowed. I think about that to this day when I get nails done. I'm sure he'd agree I'm old enough now.

8. After his death, I underwent regular grief counseling at Montefiore Hospital for almost a year to help cope with his death. I drew pictures and they asked me questions. My sisters and I didn't have any male father figure anymore. We had to become more independent. Having fun as a family stopped. There was no time. I started acting out especially toward my late teenage years. There was no one to hold me accountable like my Papa did.

9. Unfortunately, I don't have gifts or physical mementos of my father anymore. Many pictures got lost in moves, the Aristocats in Spanish VHS tape got stuck in the VCR and broke, his gold bracelet that my mother gave me after he died we had to sell when I was 19-years-old when things got tough financially, but I know he's always with me.

10. I'm now a mother of two—a 9-year-old boy and a 4-month-old girl. Doctors didn't think I'd ever get pregnant though because of a disease I suffer from. I'll never forget though when the doctors called me on Christmas Eve, Manuel's birthday, to tell me that against all odds, I was pregnant. I knew immediately it was a boy and that my guardian angel, my Papa, was watching over me. Nine months later, I gave birth to beautiful baby boy. We named him Robert Manuel, after my papa. I tell my son every day what a great man his grandfather was and the significance of his namesake.

11. In contrast, I have no relationship, and never have, with the person listed on my birth certificate as my father. He lives in the Dominican Republic and has never contacted me or visited. I am over 30 years old today and still have had no contact with him. My child recognizes Manuel as his grandfather and the father who raised me.

12. I later found out that me and my sisters received non-economic dependency awards from the original Victims' Compensation Fund of 2001 on account of our status as functional equivalents of dependent children, and Manuel listed me and my two sisters as his dependents on his 1997, 1998, 1999, and 2001 tax returns.

13. Every year around 9/11 my family donates money to our church and gather there to share stories and blessings in Manuel's honor, and his name gets included in the mass reading. I miss him so much, especially on those days.

14. 9/11 ripped our family apart. I was devastated by Manuel's tragic death. I was robbed of a father. I feel Manuel's loss every day and share fond memories of him. The night before he died, I didn't get to ask for my father's blessing like I did every other night. I thought I would have another chance, but I eventually had to accept the terrible truth that he was really gone. To this day, I still think about that night, and how I would give anything to have been able to say goodnight to my Papa that one last time.

15. Manuel and I had a very close relationship akin to a father and daughter (and in fact

he may actually be my biological father) and we considered each other to be father and daughter in every way. Accordingly, I should be deemed the functional equivalent of Manuel's daughter.

Executed on: May 19<sup>th</sup> 2024

Name (Signature): Jaimercedes Taveras

Name (Print): Jaimercedes Taveras

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# **EXHIBIT 1**









